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February 26, 2025

VIA ECF

Honorable Dale E. Ho
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Creditincome Limited, et al. v. The Swiss Confederation*, No. 1:24-cv-04316-DEH —
Unopposed Request for Extension of Time

Dear Judge Ho,

We are counsel for all plaintiffs in this action and write with the consent of Defendant The Swiss Confederation (“**Switzerland**”). By letter motion dated January 26, 2025 (ECF No. 82), the parties jointly requested entry of an order extending Defendant’s time to respond to the Amended Complaint to February 21 and rescheduling the initial case management conference for on or after March 3. The Court granted that request on January 28 and ordered Defendant to respond to the Amended Complaint by February 21, 2025, with the conference being rescheduled for March 5 at 10 a.m. ECF No. 83. Defendant filed a Motion to Dismiss the Amended Complaint on February 21, 2025 (ECF No. 85) (the “**Motion**”), accompanied by a Swiss law declaration. ECF No. 87. The parties proposed case management plan and joint letter in preparation for the conference is submitted concurrently herewith.

Plaintiffs request that Plaintiffs’ time to respond to the Motion be extended to April 4, with any reply by Defendant due by May 5, 2025. Defendant does not oppose this request.

Extending the deadline as requested will give Plaintiffs time to prepare a Swiss law declaration in rebuttal to the declaration submitted by Defendant. The extension also ensures that both parties can properly brief the issues raised in Defendant’s Motion, including arguments under the Foreign Sovereign Immunities Act, New York law, and the *forum non conveniens* doctrine.

The Court has granted two previous extension requests for Defendant to respond to Plaintiffs’ pleadings. On October 9, 2024, the Court granted the parties’ request to extend Defendant’s time to answer the Complaint to December 4, 2024. ECF No. 35. And as noted

above, the Court also extended Defendant's time to respond to the Amended Complaint from February 3 to February 21. ECF No. 83.

We thank the Court for its consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'AL2' with a horizontal line extending to the right.

Alex H. Loomis

CC: William Savitt, Esq.
Anitha Reddy, Esq.
Wachtell, Lipton, Rosen & Katz